

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REVERE TACTICAL OPPORTUNITIES
REIT, LLC,

Plaintiff,

v.

JEFFERSON HILLS ACQUISITION LLC,
BEAVER HEALTHCARE REAL ESTATE,
LLC, MULBERRY HEALTHCARE REAL
ESTATE, LLC, RIDGEVIEW
HEALTHCARE REAL ESTATE, LLC,
LAKEVIEW HEALTHCARE REAL
ESTATE, LLC, SCOTTDALE
HEALTHCARE REAL ESTATE, LLC,
JEFFERSON HILLS OPERATING LLC,
BEAVER HEALTHCARE OPERATING,
LLC, MULBERRY HEALTHCARE
OPERATING, LLC, RIDGEVIEW
HEALTHCARE OPERATING, LLC,
LAKEVIEW HEALTHCARE OPERATING
LLC, AND SCOTTSDALE HEALTHCARE
OPERATING, LLC,

Defendants.

Case No. 3:24-cv-00052-KRG

JOINT MOTION TO CONTINUE HEARING

1. Pursuant to this Honorable Court's Order of April 2, 2024, a hearing on Proposed-Intervenor OptimumBank's Motion to Intervene (ECF No. 8), Objection to Plaintiff's Emergency Application for Appointment of Receiver (ECF No. 9), Motion for Temporary Restraining Order and Preliminary Injunction (ECF Nos. 10, 11) (collectively, "Motions") is set for April 23, 2024, at 1:30 p.m.
2. Attorneys Kenneth J. Ottaviano and Paige Barr Tinkham are lead trial counsel for OptimumBank.

3. However, lead trial counsel, Kenneth J. Ottaviano and Paige Barr Tinkham, are obligated to attend a trial on April 23, 2024 in the following matter:

a. *In re SC Healthcare Holdings, LLC* (Bankr. D. Del.), Case No. 24-10443

4. This is a direct conflict with the hearing scheduled on April 23, 2024.

5. In the past few days, counsel for Plaintiff and Proposed-Intervenor have worked together to identify suitable hearing dates for all counsel and parties.

6. Counsel have identified the date of April 30, 2024 as an available hearing date.

7. This motion is unopposed.

8. It is respectfully requested that this Honorable Court grant the within motion and reschedule a hearing date convenient for all counsel and the Court.

Dated: April 8, 2024

/s/ Rusty O'Kane (with consent)

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Counsel for Proposed-Intervenor

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April, 2024, a true and correct copy of the foregoing document was served upon all counsel of record via the ECF filing system.

/s/ Alexander J. Bell
Counsel for Proposed-Intervenor